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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION
 11

12 LAWYERS' COMMITTEE FOR CIVIL
 RIGHTS OF THE SAN FRANCISCO
 13 BAY AREA,

14 Plaintiff,

15 v.

16 DEPARTMENT OF HOMELAND
 SECURITY, *et al.*,

17 Defendants.
 18

) CASE NO. 24-cv-09330-TSH

) ~~STIPULATION AND PROPOSED~~
) SCHEDULE FOR CASE

19 Subject to the Court's approval, plaintiff Lawyers' Committee for Civil Rights of the San
 20 Francisco Bay Area ("Plaintiff") and defendants United States Department of Homeland Security and
 21 United States Immigration and Customs Enforcement ("ICE") (collectively, "Defendants"), through
 22 their undersigned counsel of record, hereby STIPULATE as follows:

23 1. On November 25, 2025, the Court granted the parties' stipulation (i) continuing the
 24 deadline for Defendants' next rolling production until December 29, 2025, with subsequent productions
 25 being made on a rolling basis on or about the end of each month, (ii) requiring the parties to meet and
 26 confer on or before December 17, 2025, regarding extensions of future production deadlines and the
 27 schedule for the remainder of the litigation, and (iii) ordering the parties to submit a joint status report to
 28 the Court on or before December 19, 2025. ECF No. 36 ("Order").

STIPULATION AND ~~PROPOSED~~ SCHEDULE FOR CASE
 24-CV-09330-TSH

1 2. The parties met and conferred by telephone on December 16, 2025 regarding this matter.
2 Pursuant to those discussions, the parties stipulate that — consistent with their last stipulation, ECF No.
3 35, and the Order — ICE will make its next production on or before December 29, 2025, with
4 subsequent productions on a rolling basis on or about the end of each month, subject to reasonable
5 extensions that the parties may agree upon without a court order in the event of unforeseen conflicts.

6 3. As background, Defendants have produced — and are continuing to produce —
7 documents and video files in response to Plaintiff's FOIA request. Defendants produced documents to
8 Plaintiff on May 16 and June 20, 2025. The June document production was an interim production of all
9 remaining documents responsive to Plaintiff's FOIA request that included redactions reflecting GEO's
10 objections and withholdings provided in response to ICE's submitter's notice, in addition to ICE's
11 exemption claims. The June document production was made to expedite Plaintiff's access to the
12 documents and enabled the parties to discuss the documents and GEO's objections and withholdings.
13 Following those discussions, and as previously reported to the Court, ICE issued a notice of intent to
14 disclose to GEO on November 14, 2025, requesting a response by December 15, 2025. *See* ECF No. 35.
15 Pursuant to the notice, ICE expects to make a supplemental production of documents with appropriate
16 withholdings lifted on or about December 29, 2025. ICE expects this to be the final production of
17 documents responsive to Plaintiff's FOIA request.

18 4. ICE has also been reviewing and processing video files responsive to Plaintiff's FOIA
19 request, with productions of video files on July 15, August 27, and September 15, 2025. As noted
20 above, ICE will make its next production of video files on or before December 29, 2025, with
21 subsequent productions on a rolling basis on or about the end of each month (subject to any reasonable
22 extensions agreed to by the parties).

23 5. Given the estimated number of productions remaining, the parties further stipulate and
24 respectfully request that they submit a joint status report to the Court on or before **June 26, 2026**
25 regarding their progress, including whether any dates need to be scheduled at that time.

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1 IT IS SO STIPULATED.

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3 DATED: December 18, 2025

Respectfully submitted,

4 CRAIG H. MISSAKIAN
United States Attorney

5 /s/ Savith Iyengar
6 SAVITH IYENGAR
Assistant United States Attorney

7 Counsel for Defendants

8
9 DATED: December 18, 2025

Respectfully submitted,

10 **/s/ Brock Seraphin
11 BROCK SERAPHIN

12 Counsel for Plaintiff

13 ** In compliance with Civil Local Rule 5-1(i)(3),
14 the filer of this document attests under penalty
15 of perjury that all signatories have concurred in
16 the filing of this document.

~~PROPOSED~~ ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED THAT ICE will make its next production on or about December 29, 2025, with subsequent productions on a rolling basis on or about the end of each month, subject to reasonable extensions that the parties may agree upon without a court order in the event of unforeseen conflicts.

IT IS FURTHER ORDERED THAT the parties submit a joint status report to the Court regarding their progress, including whether any dates need to be scheduled, by June 26, 2026.

IT IS SO ORDERED.

DATED: December 18, 2025


HON. THOMAS S. HIXSON
United States Magistrate Judge